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November 15, 2023

**Via Electronic Filing**

The Honorable Colleen McMahon, U.S.D.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Nieves et al v. Vanderleigh Properties, LLC et al*  
Case No.: 1:22-cv-10581-CM

Dear Honorable Judge McMahon:

This law firm represents Plaintiffs Eduardo Nieves and Veronica Ramirez (the “Plaintiffs”) in the above-referenced matter. This letter is submitted jointly with counsel for Defendants 7 of 8 Realty Co. LLC, Jayden 65 Co. LLC, Loquis 80 Co. LLC, Praxis Realty Co. LLC, Vanderleigh Properties, LLC (collectively, the “Corporate Defendants”), Robert Moses, Henry Moses, Jr., and Kelvin Trevino, (collectively, “Individual Defendants”, and together with the Corporate Defendants, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, this joint letter serves to request a referral to Court-annexed mediation. The parties believe that a referral to virtual mediation – facilitated by an experienced mediator – would significantly facilitate settlement discussions.

In light of the foregoing, it is respectfully requested that the Court refer the parties to Court-annexed mediation.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel